



STATE OF ALASKA
DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

*Bill Walker, Governor
Mike Navarre, Commissioner
Stephen McAlpine, Chairman*

Regulatory Commission of Alaska

May 8, 2018

In reply refer to: Common Carrier Section

Dana Wilson
Federal Communications Commission
Consumer and Governmental Affairs Bureau
Disability Rights Office
445 12th Street, SW
Washington, DC 20554

**Re: State Recertification Application – Supplemental Filing
CG Docket No. 03-123**

Dear Ms. Wilson:

On September 28, 2017, the Regulatory Commission of Alaska (RCA) filed an application for recertification of Alaska's Telecommunications Relay Service program.¹ On April 24, 2018, the Federal Communications Commission (FCC) sent an email requesting additional information from the RCA.

The RCA provides the following information in response to the FCC's request. Further, the RCA certifies that it is in compliance with the rule sections noted in the FCC's follow up inquiry email.

If there are any questions regarding this filing, please contact Jess Manaois at john.paul.manois@alaska.gov; telephone (907) 263-2174. Thank you for your assistance.

Sincerely,

Stephen McAlpine, Chairman
Regulatory Commission of Alaska

¹See *Telecommunications Relay Service State Recertification Application Submitted by the Regulatory Commission of Alaska*, filed September 28, 2017 (Application).

47 C.F.R. §64.604(a)(1)(v) Mandatory Minimum Standards.

CAs answering and placing a TTY-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party.

RCA's Response:

Consistent with the new requirement in 64.604(a)(1)(v), Sprint CAs answering or placing a STS call stay with the call for a minimum of twenty minutes.

47 C.F.R. §64.604(c)(2) Contact Persons.

Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

- (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;
- (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and
- (iii) The physical address to which correspondence should be sent.

RCA's Response:

Below is the RCA's contact person for TRS consumer information and complaints. Please update the FCC's website accordingly.

Grace Salazar

Consumer Protection and Information Officer II

Regulatory Commission of Alaska

701 West 8th Avenue, Suite 300

Anchorage, AK 99501

Telephone numbers: 907-276-6222; TTY 7-1-1 or 1-800-770-8973; Fax 907-276-0160

Toll-free (within Alaska) 1-800-390-2782

E-mail: cp.mail@alaska.gov

Website: <http://rca.alaska.gov/RCAWeb/ForConsumers/InformalComplaints.aspx>

TRS Provider: Sprint Communications Company L.P.

47 C.F.R. §64.606(d) Method of funding.

Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

RCA's Response:

As noted in our application, the FCC has previously approved funding for TRS service in Alaska through a surcharge on basic local exchange customers' bills, labeled the "Universal Access Surcharge." Further, we also indicated that the RCA is not aware of potential conflicts with federal law.²

²Application at 5.

47 C.F.R. §64.5105 – 64.5110 TRS Customer Proprietary Network Information

47 C.F.R. §64.606(b)(1)(i) requires that state TRS programs establish that they meet or exceed all operational, technical, and functional minimum standards contained in 64.604. 64.604(d) incorporates by reference the CPNI rules, the states are required to establish that their programs comply with the CPNI rules.

RCA's Response:

The RCA certifies that the Alaska TRS program meets or exceeds all operational, technical, and functional minimum standards contained in 47 C.F.R. §64.604, including the CPNI rules referenced in 47 C.F.R. §64.604(d).

As Alaska's TRS Provider, Sprint files FCC Customer Proprietary Network Information (CPNI) compliance certification with FCC annually as required. See Attachment A.

ATTACHMENT A

SPRINT'S STATEMENT OF CPNI COMPLIANCE

Sprint Corporation ("Sprint") complies with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") minimum standards with respect to Sprint's role as a contractor supporting Alaska's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is Alaska's responsibility to certify Alaska's TRS program every 5 years. The following statement only explains the operating procedures established by Sprint to ensure its compliance with the CPNI rules (see 47 C.F.R. §64.5101 *et seq.*) as a contractor supporting the State TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address Alaska's compliance as the Alaska TRS program administrator or the activities of any other contractors that Alaska may use to support the Alaska TRS program. Per the FCC, Alaska has an obligation to provide a CPNI statement to the FCC in accordance with FCC 47 C.F.R. §64.604(d) and 64.606(c)(1).

Data Brokers

As Alaska's TRS Provider, Sprint did not detect any pretexting activities by data brokers during the certification period.

CPNI Complaints

As Alaska's TRS Provider, Sprint did not receive any complaints during the certification period concerning the unauthorized release of TRS CPNI.

Use, Disclosure and Access to CPNI

As Alaska's TRS Provider, Sprint did not use, disclose or permit access to TRS CPNI in 2017 without complying with procedures specified in 47 C.F.R. §64.5101 *et seq.* Sprint did not use, disclose, or permit access to TRS CPNI for marketing purposes or for any other reason not authorized in 47 U.S.C. §64.5105(c).

Safeguards

As Alaska's TRS Provider, Sprint takes reasonable measures to discover and protect against attempts to gain unauthorized access to TRS CPNI. Consistent with Sprint's commitment to preserving customer privacy, as the Alaska's contractor, Sprint has a variety of training programs for its employees and subcontractors. The training explains how Sprint employees and subcontractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. During the certification period, all Sprint employees and all subcontractors who had access to TRS CPNI took CPNI training.

As the TRS provider in Alaska, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigate instances of potential improper access or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action is taken, up to and including termination.

Before disclosing CPNI to subcontractors, Sprint enters into agreements with strict privacy and confidentiality provisions that require the subcontractor to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires subcontractors with which it shares CPNI to safeguard this information in a manner that is consistent with the FCC's rules and retains the right to terminate the contract in the event of a breach.

Authentication

Sprint does not currently offer users of the Alaska TRS service telephonic, online, or in-store access to TRS CPNI. Therefore, the authentication requirements in 47 C.F.R. §64.5110 are not applicable at this time with respect to Sprint's role as Alaska's contractor.

Notification of Account Changes

Sprint provides notice to Alaska's TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within scope of Sprint's responsibilities.

Notification of CPNI Breaches

In accordance with the FCC's rules, Sprint provides notice to law enforcement in the event that a breach of customer information includes CPNI. Sprint also provides notice to impacted customers after completing the process of notifying law enforcement. Such notification provides customers with enough information to understand the nature of the breach, the scope of impacted information and recommendations on how the customer should respond. If the impacted customer alerts Sprint of a potential breach, Sprint investigates the customer's allegations and communicates as necessary with the customer and/or law enforcement. Sprint did not have any breaches of Alaska TRS CPNI during the certification period.